



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Justin Van Pelt, *et al.*

*

Plaintiffs

*

v.

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Case No. 1:19-cv-00711-BPG

Giuseppe's, Inc., *et al.*

*

Defendants

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DECLARATION OF SCOTT E. KRAFF

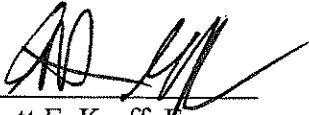
1. I, Scott E. Kraff, Esq., am at least 18 years of age and competent to testify, and I am not a party to, or related to a party, in this action. I am employed by Hoffman Employment Law, LLC, and serve as an associate to Howard B. Hoffman, counsel to the Plaintiffs in the above-referenced matter.
2. By way of brief background, I am an attorney in private practice and I concentrate on employment law. I have practiced law since 2016, when I graduated from Georgetown University Law Center. I am admitted to the Maryland bar (since 2016) and I was sworn into the bar for the U.S. District Court for the District of Maryland on May 24, 2019.
3. Prior to my employment with Hoffman Employment Law, LLC, I gained experience in employment law during my two-year tenure as a law clerk at Joseph, Greenwald, & Laake, P.A., a civil litigation firm in Greenbelt, Maryland. As a law clerk, I worked on cases on behalf of plaintiffs in cases involving unlawful discrimination and hostile work environments, retaliation, unpaid wages, and other related matters. As an associate with Hoffman Employment Law, LLC, I now focus almost exclusively on employment law cases, primarily those concerning unpaid wage violations involving the FLSA and related

state statutes.

4. My total time in this case, through July 8, 2019, was 15.5 hours. The total value of this time is \$3,177.50. Aside from the review of documents and communications and requisite conferences with Howard B. Hoffman, opposing counsel, and the Court, I worked on several more complex tasks during the case. In April 2019, I drafted a motion to deem admitted in response to Defendants' Answer. In June 2019, I drafted written discovery requests to the Defendants and reviewed documents provided by Defendants related to their initial settlement offer. Also in June 2019, I assisted in negotiating the settlement of this case by maintaining contact with Plaintiffs to assess their settlement positions and determine alternative damage computations. Later that month, I drafted the settlement documents, including the Settlement Agreement and Joint Motion for Approval.
5. I maintained my time and costs records in this case, which I placed into "Rocketmatter"© software. The time records reflect actual time that I expended in the prosecution of this litigation (the "RocketMatter" entries are not in the court's required lodestar billing format). I inputted my time promptly following work performed. I specified the time spent per task to the fullest extent practicable and I avoided the practice of block billing.
6. The hourly rate claimed in this case, i.e., \$205/hour, is well within the range permitted by the U.S. District Court for the District of Maryland (Lodestar Guidelines). My requested rate is also supported by primary counsel on this matter, Howard B. Hoffman, Esq., whose Declaration is marked Exhibit 3.

DECLARANT FURTHER SAYETH NAUGHT

I solemnly affirm under the penalties of perjury that the contents of the foregoing declaration of true and correct.

A handwritten signature in black ink, appearing to read 'Scott E. Kraff', is written over a horizontal line.

Scott E. Kraff, Esq.
July 8, 2019